

VESTAR PACKAGE

Mario please
add to this package all
other comments and do
my pertinent report
due diligence not
previously sent to Rich
Kuhle. Kim will
send with my cover
letter today.

HA.

TO Tom OverTurf DATE 3/21/97

FROM DAN SUMMERS

Jim Bolmer sent
the enclosed back to
me, rather than to you.

DS

MCDONNELL DOUGLAS



PETE WILSON
GOVERNOR

State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814



LEE GRISSOM
DIRECTOR

March 21, 1997

HADAR PLAFKIN
CITY OF LOS ANGELES PLANNING DEPT
ENVIRONMENTAL REVIEW SECTION
221 N. FIGUEROA ST., RM. 1500
LOS ANGELES, CA 90012

Subject: HARBOR GATEWAY CENTER SCH #: 96051050

Dear HADAR PLAFKIN:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610

March 3, 1997

IGR/CEQA/DEIR#970216
Harbor Gateway Center
EIR 96-0090-SUB(ZV) (CUB) (DA)
McDonnell Douglas (applicant)
Vic: LA-213-7.98-9.98 & LA-405-13.99
SCH# 96051050



Mr. Hadar Plafkin
Planning Department
City of Los Angeles
221 N. Figueroa St., Room 1500
Los Angeles, CA 90012

Dear Mr. Plafkin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project is a retail "power center" and office/industrial park on a 170-acre site. The first phase consists of 450,000 square feet of retail development. The second and third phases include an estimated 1.3 million and 1.2 million square feet respectively of office/industrial park space.

Based on our review of the DEIR for this project we have the following recommendation:

Mitigation measures for the San Diego Freeway off-ramp/project driveway and 190th Street are described in Item 20- Page 235 of the document. In addition to these measures, a wrong way deterrent is needed at the Route 405 Southbound off-ramp at project driveway and 190th Street.

We would like to remind you that this project's credits/debits need to be reported pursuant to MTA's CMP requirements.

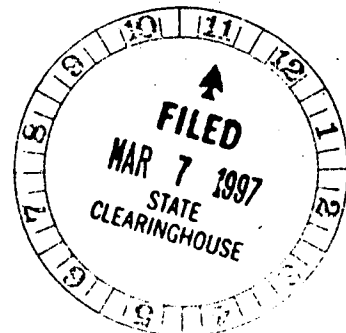
A Caltrans Encroachment Permit is needed in all instances where the proposed work or transportation related mitigation measures falls within the State right-of-way. We recommend that the applicant submit an application along with six (6) sets of engineering plans to the Caltrans Permits Office for review.

Thank you for this opportunity to comment. If you have any questions, regarding these comments, please call me at (213) 897-4429.

Sincerely,

Original signed by

STEPHEN J. BUSWELL
IGR/CEQA Coordinator
Transportation Planning Office



cc: Chris Belsky
State Clearinghouse

SCH # 96051050

NOTICE OF COMPLETION

TO: STATE OF CALIFORNIA
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

Project Title Case No.
Harbor Gateway Center EIR No. 96-0090-SUB(ZV)(CUB)(DA)

Project Location - Specific
1414 W. 190th Street between Western and Normandie Avenues in Harbor Gateway, California

Project Location - City Project Location - County
Los Angeles Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project
The demolition of approximately 2.5 million square feet of industrial/warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

McDonald Douglas Realty Company
4060 Lakewood Boulevard, Long Beach, CA 90808

Lead Agency Division
City of Los Angeles Department of City Planning
Environmental Review Section
221 N. Figueroa St., Room 1500
Los Angeles, CA 90012

Address Where Copy of EIR is Available
Office of the City Clerk, Room 395 City Hall, Los Angeles 90012

Review Period (Calendar Dates)
Starting Date Ending Date
February 6, 1997 March 24, 1997

Contact Person Title Area Code/Phone
Hadar Plafkin City Planner (213) 580-5554

State Clearinghouse Contact: Mr. Chris Belsky
(916) 445-0613

Project Sent to the following State Agencies

State Review Began: 2-5-97
Dept. Review to Agency 3-14
Agency Rev to SCH 3-19
SCH COMPLIANCE 3-21

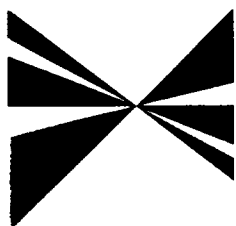
Please note SCH Number on all Comments

Please forward late comments directly to the Lead Agency

AQMD/APCD 33 (Resources: 2/8)

<input checked="" type="checkbox"/> Resources	State/Consumer Svcs
<input type="checkbox"/> Boating	General Services
<input type="checkbox"/> Coastal Comm	Cal/EPA
<input type="checkbox"/> Coastal Conserv	<input checked="" type="checkbox"/> ARB
<input type="checkbox"/> Colorado Rvr Bd	<input checked="" type="checkbox"/> CA Waste Mgmt Bd
<input type="checkbox"/> Conservation	SWRCB: Grants
<input checked="" type="checkbox"/> Fish & Game # 5	SWRCB: Delta
<input type="checkbox"/> Delta Protection	
<input type="checkbox"/> Forestry	SWRCB: Wtr Quality
<input type="checkbox"/> Parks & Rec/OHP	SWRCB: Wtr Rights
<input type="checkbox"/> Reclamation	<input checked="" type="checkbox"/> Reg. WQCB # 4
<input type="checkbox"/> BCDC	DTSC/CTC
<input checked="" type="checkbox"/> DWR	
<input type="checkbox"/> OES	Yth/Adlt Corrections
<input type="checkbox"/> Bus Transp Hous	Corrections
<input type="checkbox"/> Aeronautics	Independent Comm
<input type="checkbox"/> CHP	<input checked="" type="checkbox"/> Energy Comm
<input checked="" type="checkbox"/> Caltrans # 7	NAHC
<input checked="" type="checkbox"/> Trans Planning	PUC
<input type="checkbox"/> Housing & Devel	Santa Mn Mtns
<input type="checkbox"/> Health & Welfare	<input checked="" type="checkbox"/> State Lands Comm
<input type="checkbox"/> Drinking H2O	Tahoe Rgl Plan
<input type="checkbox"/> Medical Waste	Other:

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

Main Office

818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers: • President: Mayor Pro Tem Dick Kelly,
Palm Desert • First Vice President: Supervisor
Yvonne Brathwaite Burke, Los Angeles County •
Second Vice President: Mayor Bob Bartlett,
City of Monrovia • Immediate Past President:
Supervisor Bob Buster, Riverside

County of Imperial: Sam Sharp, Imperial County
• David Dhillon, El Centro

County of Los Angeles: Yvonne Brathwaite Burke,
Los Angeles County • Richard Alarcon, Los Angeles
• Richard Alatorre, Los Angeles • Eileen Ansari,
Diamond Bar • Bob Barden, Monrovia • George
Bass, Bell • Hal Bernson, Los Angeles • Sue Bauer,
Glendora • Marvin Braude, Los Angeles • Robert
Bruesch, Rosemead • Laura Chick, Los Angeles •
John Crawley, Cerritos • Joe Dawidziak, Redondo
Beach • Doug Drummond, Long Beach • John
Ferraro, Los Angeles • Michael Feuer, Los Angeles •
Karyn Foley, Calabasas • Ruth Galanter, Los Angeles
• Eileen Givens, Glendale • Jackie Goldberg, Los
Angeles • Garland Hardeman, Inglewood • Mike
Hernandez, Los Angeles • Nate Holden, Los
Angeles • Abbe Land, West Hollywood • Barbara
Messina, Alhambra • David Myers, Palmdale •
George Nakano, Torrance • Jenny Oropeza, Long
Beach • Beatrice Proo, Pico Rivera • Mark Ridley-
Thomas, Los Angeles • Richard Riordan, Los
Angeles • Albert Robles, South Gate • Marcine
Shaw, Compton • Ray Smith, Bellflower • Rudy
Svorinich, Los Angeles • Joel Wachs, Los Angeles •
Rita Walters, Los Angeles • Judy Wright, Claremont
• Paul Zee, South Pasadena

County of Orange: Marian Bergeson, Orange
County • Ron Bates, Los Alamitos • Art Brown,
Buena Park • Jan Debay, Newport Beach • Richard
Dixon, Lake Forest • Sandra Genis, Costa Mesa •
Candace Haggard, San Clemente • Wally Linn, La
Palma • Bev Perry, Brea

County of Riverside: Bob Buster, Riverside
County • Dennis Draeger, Calimesa • Dick Kelly,
Palm Desert • Ron Loveridge, Riverside • Ron
Roberts, Temecula

County of San Bernardino: Larry Walker, San
Bernardino County • Bill Alexander, Rancho
Cucamonga • Jim Bagley, Twentynine Palms •
Deirdre Bennett, Colton • David Eshleman, Fontana
• Tom Minor, San Bernardino • Gwen Norton-
Perry, Chino Hills

County of Ventura: Judy Mikels, Ventura County •
Andrew Fox, Thousand Oaks • Stan Daily, Camarillo
• John Melton, Santa Paula

February 27, 1997

Mr. Hadar Plafkin, Project Coordinator
City of Los Angeles
Department of City Planning
221 North Figueroa Street, Room 1500
Los Angeles, CA 90012

**RE: Comments on the City of Los Angeles, Draft Environmental
Impact Report for Harbor Gateway Center - SCAG No. I
9700050**

Dear Mr. Plafkin:

Thank you for submitting the City of Los Angeles, Draft
Environmental Impact Report for Harbor Gateway Center to
SCAG for review and comment. As areawide clearinghouse for
regionally significant projects, SCAG assists cities, counties and other
agencies in reviewing projects and plans for consistency with regional
plans.

The attached detailed comments are meant to provide guidance for
considering the proposed project within the context of our regional
goals and policies. If you have any questions regarding the attached
comments, please contact Bill Boyd at (213) 236-1960.

Sincerely,

VIVIANE DOCHE-BOULOS
Intergovernmental Review

H:\LAHARGTC.GEN

**COMMENTS ON THE CITY OF LOS ANGELES
HARBOR GATEWAY CENTER
DRAFT ENVIRONMENTAL IMPACT REPORT**

PROJECT DESCRIPTION

The proposed Project involves the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and the construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandy and Western Avenues, in the City of Los Angeles. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

The Draft EIR evaluates six alternatives to the proposed Project: Alt. 1 -- No Project; Alt. 2 -- Master Planner Block Development (current plan plus adjacent International Metals site); Alt. 3 -- Alternative Land Use (different mix of land uses with more intensive office/industrial); Alt. 4 -- Reduced Intensity (same uses but 25% reduction in intensity); Alt. 5 -- Golf Course (same Area 1 but 130.2 acre, 18 hole golf course in Area 2); and, Alt. 6 -- large Parcelization (entire site developed for office/industrial use).

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Mobility (adopted June 1994), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Mobility Element (RME) constitutes the region's Transportation Plan. The RME policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local

government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the project with those policies.

Consistency With Regional Comprehensive Plan and Guide Policies

1. **The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan contains a number of policies that are particularly applicable to this Specific Plan.

a. *Core Growth Management Policies*

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. As SCAG has designated subregions, the project is situated in the City of Los Angeles subregion. Implementation of the project would result in the creation of about 5,000 jobs at buildout, which represents about 3 percent of the subregion's employment growth between 1996 and 2010. The Project is consistent with this RCPG policy.

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments: The Draft EIR contains a limited amount of information concerning this policy, especially the coordination of public facilities, utility systems and transportation with the timing and financing proposed project. Estimated buildout for Area 1 would be 1998 and 2006 for Area 2. It is not possible to determine the degree to which the proposed Project is consistent with this policy.

b. *Ancillary Growth Management Policies*

3.04 *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*

SCAG staff comments. The Draft EIR contains a limited amount of information concerning this policy, especially the types of jobs in relationship to availability of adequately priced housing in the vicinity of the proposed project. It is not possible to determine the degree to which the proposed Project is consistent with this policy.

- 3.05 *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.08 *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

SCAG staff comments. The Draft EIR references the consistency of the proposed Project with the economic strategies in the Harbor Gateway District Plan, noting the area as a regional employment and transportation hub. The Draft EIR acknowledges that implementation of the proposed Project will help in the areas economic recovery from aerospace job loss at the McDonnell Douglas Corporation plant by creating new retail, office and industrial jobs in an amount nearly equivalent to lost jobs. The Project is consistent with this RCPG policy.

- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments: The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR acknowledges the use of flexible growth management policies, development regulations, standards, design guidelines and would therefore be supportive of this RCPG policy.

- 3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing subregions.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.16 *Encourage developments in and around activity centers, transportation node corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

- 3.26 *Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.*

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

2. The Regional Mobility Chapter (RMC) also has policies, all of which are core, that pertain to the proposed project. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among

the relevant policies in this chapter are the following:

Transportation Demand Management and Regional Transit Program Policies

- 4.01 Promote Transportation Demand Management programs along with transit and ridesharing facilities as a viable and desirable part of the overall program while recognizing the particular needs of individual subregions.*
- 4.03 Support the extension of TDM program implementation to non-commute trips for public and private sector activities.*
- 4.04 Support the coordination of land use and transportation decisions with land use and transportation capacity, taking into account the potential for demand management strategies to mitigate travel demand if provided for as a part of the entire package.*
- 4.06 Support efforts to educate the public on the efficacy of demand management strategies and increase the use of alternative transportation.*
- 4.07 Public transportation programs should be considered an essential public service because of their social, economic, and environmental benefits.*

SCAG staff comments. The Draft EIR's Air Quality and Transportation/Circulation chapters adequately address the provision of TDM and transit services. Appropriate mitigation measures are included to assure that these needs are dealt with. The Project is consistent with the five TDM/transit RCPG policies.

Regional Streets and Highways Program Policies

- 4.10 Potential down-stream congestion impacts from capacity enhancing projects will be studied.*

SCAG staff comments. The Draft EIR indicates that capacity enhancements will be required on a number of major arterials and intersections, in part, to serve transportation demand generated from the proposed Project. SCAG's Regional Travel Forecast Model was adjusted to reflect local development proposals and served as basis for analysis of the project's transportation impacts. The Draft EIR acknowledges that significant traffic impacts would remain at four intersections and three freeway locations that could not be mitigated below a level of significance. The proposed Project is consistent with this RCPG policy, although there remains some unavoidable significant impacts.

4.20 Expanded transportation system management by local jurisdictions will be encouraged.

4.23 TSM activities throughout the region shall be coordinated among jurisdictions.

SCAG staff comments. The Draft EIR references a number of on- and off-site transportation system management actions and mitigation measures, such as traffic signals, Automated Traffic Surveillance and Control (ATSAC), and intersection improvements to speed the flow of traffic. The Project is consistent with these two RCPG policies.

Regional Non-Motorized Transportation Program Policies

4.25 The development of the regional transportation system should include a non-motorized transportation system that provides an effective alternative to auto travel for appropriate trips. The planning and development of transportation projects and systems should incorporate the following, as appropriate:

- a ○ Provision of safe, convenient, and continuous bicycle and pedestrian infrastructure to and throughout areas with existing and potential demand such as activity areas, schools, recreational areas (including those areas served by trails), which will ultimately offer the same or better accessibility provided to the motorized vehicle.*
- b ○ Accessibility to and on transit (bus terminals, rail stations, Park-And-Ride lots), where there is demand and where transit boarding time will not be significantly delayed.*
- c ○ Maintenance of safe, convenient, and continuous non-motorized travel during and after the construction of transportation and general development projects. Existing bikeways and pedestrian walkways should not be removed without mitigation that is as effective as the original facility.*

SCAG staff comments. See comment under policy 3.12. The Project is consistent with this RCPG policy.

4.27 Urban form, land use and site-design policies should include requirements for safe and convenient non-motorized transportation, including the development of bicycle and pedestrian-friendly environments near transit.

SCAG staff comments. The Specific Plan includes urban form, land use and site-design policies that support non-motorized transportation as noted previously under SCAG policies 3.12 and 4.25. The Project is consistent with this RCPG policy.

3. The Air Quality Chapter (AOC) core actions that are generally applicable to the proposed Project are as follows:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. The propose Project's two TDM mitigation measures: compliance with Ordinance No. 168.700 (Transportation Demand Management and Trip Reduction Measures) and compliance with SCAQMD Rule 2202 reflect an openness to look at new technologies. Consideration should be given to approaches which provide for telecommunications and community based shuttle services and which utilize new clean air technologies. The Project is consistent with this RCPG policy.

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments: The Draft EIR (Land Use, Air Quality and Transportation/Circulation chapters) include specific reference to this SCAG policy and details how the Specific Plan addresses land use, transportation and economic interrelationships which help to minimize motor vehicle trips and improve air quality. The Project is consistent with this RCPG policy.

The Draft EIR under review does not require a federal action, so is not subject to a finding of air quality conformity.

4. The Water Quality Chapter (WOC) core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly applicable to the proposed Project include the following:

- 11.06 *Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.*

SCAG staff comments: The Draft EIR addresses the problem of contaminated soils and groundwater, some of which is the result of off-site activity. Appropriate mitigation

measures are presented to deal with soil and groundwater contamination, contamination from the Montrose Chemical Superfund Site chlorobenzene and chloroform pollution resulting from manufacture of DDT) and on-site asbestos contamination. The Project is consistent with this RCPG policy.

- 11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments: The Draft EIR acknowledges the possible use of reclaimed water for landscape irrigation, upon its availability from either the Department of Water and Power or Dominguez Water Company. The Project is consistent with this RCPG policy.

- 11.08 Ensure wastewater treatment agency facility planning and facility development be consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and storm water demands, and the need to provide standby capacity for public safety and environmental protection objectives.*

SCAG staff comments: The Draft EIR acknowledges on page 282 that the Joint Water Pollution Control Plant of the Sanitation Districts of Los Angeles County (SDLAC) "has the capacity to serve projected future needs". The wastewater disposal section should acknowledge that the SDLAC Facilities Plan bases its projections for wastewater generation on the SCAG population projections". The Project is consistent with this RCPG policy.

INTEGRATED SOLID WASTE MANAGEMENT CHAPTER OF THE REGIONAL COMPREHENSIVE PLAN AND GUIDE

The Integrated Solid Waste Management Chapter (ISWM) is non mandated; it is provided for information and advisory purposes. The recommendations in the chapter fulfill the chapter's objectives and do not create new legal mandates for local governments or other regional governmental organizations, like sanitation or waste management districts. The chapter includes the following goals:

Solid Waste Goals

- *Promote the following waste management practices in order of priority:*
 1. *Waste Prevention.*
 2. *Recycling and Composting.*
 3. *Safe Disposal or Transformation.*

SCAG staff comments: The proposed Project addresses some actions to promote waste prevention, recycling and composting, and the safe disposal of remaining waste materials.

Some of the information in the Solid Waste section concerning available landfill capacity is out of date (BKK and Azusa landfills are now closed) and may be inconsistent with the City of Los Angeles's *Source Reduction and Recycling Element*, and the more recent *Draft Countywide Integrated Waste Management Plan (Summary Plan and Siting Element)*. The Draft EIR acknowledges the intent to complete a Solid Waste and Resources Action Plan as a proposed mitigation measure.

Conclusions and Recommendations:

- (1) As noted in the staff comments, the Project is consistent with most of the aforementioned policies of the Regional Comprehensive Plan and Guide. In a few instances, for SCAG Policies 3.03 and 3.04, consistency could not be determined.
- (2) All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Reports.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

- Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.
- Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. §7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.
- Responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. §7506.
- Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.
- The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).
- Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.
- The authorized *Areawide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)
- Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).
- Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

March 13, 1997

TO: Con Howe, Director
Department of City Planning

Attention: Hadar Plafkin, Project Coordinator

FROM: Fire Department

SUBJECT: HARBOR GATEWAY CENTER - DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) - REQUEST FOR COMMENTS - EIR 96-0090 -
SUB (ZV) (CUB) (DA)

The proposed project consists of the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area One, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area Two, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. FIRE FLOW

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 9,000 G.P.M. from six fire hydrants flowing simultaneously.

Improvements to the water system in this area may be required to provide 9,000 G.P.M. fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

All water systems and roadways are to be improved to the satisfaction of the Fire Department prior to the issuance of any building permits.

A valid Division 5 Fire Department permit is required prior to installation for all private fire hydrant systems.

B. RESPONSE DISTANCE

Based on a required fire-flow of 9,000 G.P.M., the first-due Engine Company should be within one mile, and the first-due Truck Company within one and a half miles.

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 79
18030 S. Vermont Avenue
Gardena, CA 90247
Paramedic Engine Company
Staff - 4
Miles - 1.2

Mr. Con Howe
March 13, 1997
Page 3

Fire Station No. 85
1331 W. 253rd Street
Harbor City, CA 90710
Task Force and Engine Company
Paramedic Rescue Ambulance
Staff - 12
Miles - 5.0

Fire Station No. 38
124 E. "I" Street
Wilmington, CA 90744
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Staff - 12
Miles - 4.2

Fire Station No. 64
118 W. 108th Street
Los Angeles, CA 90061
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
EMT Rescue Ambulance
Staff - 14
Miles - 6.4

Fire Station No. 49
400 Yacht Street, Berth 194
Wilmington, CA 90744
Single Engine Company
Boats 3 and 4
Battalion 6 Headquarters
Staff - 13
Miles - 7.3

The above distances were computed to the intersections of West Knox Street and South Normandie Avenue.

Based on this criteria (response distance from existing fire stations), fire protection would be considered inadequate.

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

C. FIREFIGHTING ACCESS, APPARATUS, AND PERSONNEL

At least two different ingress/egress roads for each area, that will accommodate major fire apparatus and provide for major evacuation during emergency situations shall be required.

Submit plot plans that show the access road and the turning area for Fire Department approval.

Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Standard cut-corners will be used on all turns.

During demolition, the Fire Department access will remain clear and unobstructed.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Private roadways for general access use shall have a minimum width of 20 feet.

Where cul-de-sac for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Additional vehicular access may be required by the Fire Department where buildings exceed 28 feet in height.

Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

The design, location, and operation of gates shall be to the satisfaction of the Fire Department and the Deputy Advisory Agency. Warning signs and lighting shall be installed and maintained satisfactory to the Fire Department and the Department of Transportation. The names and phone numbers of the current officers of the Homeowners Association shall be submitted to the Fire Department, Police Department, and the Deputy Advisory Agency. All necessary permits shall be secured from the Department of Building and Safety and from other City agencies.

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the subdivider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- A. The establishment of a property owners association which shall cause a yearly inspection to be made by a registered civil engineer of all common fire lanes and fire protection facilities. Any necessary maintenance and corrective measures will be undertaken by the association. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

- B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed or their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as required hereinabove must be approved in writing by the Advisory Agency after consultation with the Fire Department.
- C. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
- D. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.
- E. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

That plot plans be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

CONCLUSION

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

1. Increased staffing for existing facilities.
2. Additional fire protection facilities.
3. Relocation of present fire protection facilities.

Project implementation will increase the need for fire protection and emergency medical services in this area.

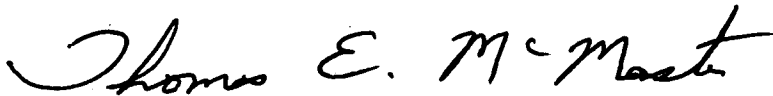
Mr. Con Howe
March 13, 1997
Page 7

The inclusion of the above recommendations, along with any additional recommendations made during later reviews of the proposed project, will reduce the impacts to an acceptable level.

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

For additional information, please contact the Construction Services Unit at (213) 485-5964.

WILLIAM R. BAMATTRE
Chief Engineer and General Manager

A handwritten signature in black ink, reading "Thomas E. McMaster". The signature is written in a cursive, flowing style.

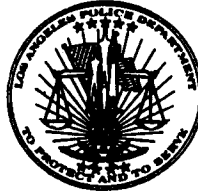
Thomas E. McMaster, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

TEM:TWOC:lq:a\hgc.wp

cc: Councilman Rudy Svorinich, Fifteenth Council District

LOS ANGELES POLICE DEPARTMENT

WILLIE L. WILLIAMS
Chief of Police



RICHARD J. RIORDAN

Mayor

P.O. Box 30158
Los Angeles, Calif. 90030
Telephone:
(310) 548-7601
Ref #: 5.3

March 19, 1997

Mr. Hadar Plafkin
Los Angeles City Planning Department
Environmental Review Section
221 N. Figueroa Street, Room 1500
Los Angeles, California 90012

Dear Mr. Plafkin:

EIR 96-0090-SUB (ZV) (CUB) (DA)

I have recently reviewed the EIR for the proposed Harbor Gateway Center. The project is located within the area over which I have command responsibility. Let me first state that I believe the project is very important to our community and the location where it will be located is in dire need of revitalization.

However, I have some concerns with information contained in the EIR for this project. Increasing the population of this segment of the community by approximately 6000 people will have a significant negative impact on law enforcement. The recommended mitigation measures listed on pages 251 and 252 will not, in my opinion, significantly reduce this impact. Therefore, I would also disagree with the conclusion on page 253.

The irregular shape of Harbor Area does have an impact on how well we can respond to calls for police service, particularly in the Harbor Gateway. A meaningful alternative to deal with this project's significant impact on my resources would be to establish a satellite police station within the Harbor Gateway Center. In so doing, some officers would be deployed directly from that facility rather than Harbor Area station which is located a considerable distance away from the proposed site. A cooperative effort between the City and the developer could make this suggestion become a reality. Naturally, the Chief of Police would have to approve this concept.

Mr. Hadar Platkin

Page 2

5.3

Again, let me emphasize my support for this project. Community members have already approached me saying how pleased they are with the proposal. Even though the impact on law enforcement will be significant, I believe these concerns can be overcome. If you have any questions or concerns, please feel free to contact me at (310) 548-7601.

Very truly yours,

WILLIE L. WILLIAMS

Chief of Police

A handwritten signature in black ink, appearing to read 'Bob', with a horizontal line extending to the right.

ROBERT B. HANSOHN, Captain
Area Commanding Officer
Harbor Community Police Station

ALLEN, MATKINS, LECK, GAMBLE & MALLORY LLP

ATTORNEYS AT LAW

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

515 SOUTH FIGUEROA STREET, SEVENTH FLOOR
LOS ANGELES, CALIFORNIA 90071-3398
TELEPHONE (213) 822-5555
FACSIMILE (213) 620-8816

March 21, 1997

ORANGE COUNTY OFFICE

18400 VON KARMAN, FOURTH FLOOR
IRVINE, CALIFORNIA 92612-1597
TELEPHONE (714) 553-1313
FACSIMILE (714) 553-8354

SAN DIEGO OFFICE

501 WEST BROADWAY, SUITE 900
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 233-1155
FACSIMILE (619) 233-1158

WEST LOS ANGELES OFFICE

1999 AVENUE OF THE STARS, SUITE 1800
LOS ANGELES, CALIFORNIA 90067-8050
TELEPHONE (310) 788-2400
FACSIMILE (310) 788-2410

OUR FILE NUMBER:

M5288-002

LA970790.068

FREDERICK L. ALLEN
JOHN C. GAMBLE
BRIAN C. LECK
RICHARD C. MALLORY
MICHAEL L. MATKINS
MARVIN E. GARRETT
MICHAEL B. GLEASON
THOMAS C. POSTER
ROBERT J. GATHCART
R. MICHAEL JOYCE
GERBEN HOSKEMA
THOMAS W. HENNING
PATRICK E. BREEN
LAWRENCE D. LEWIS
GEORGE T. MCCONNELL
MICHAEL P. SPREGOLA
DAVID A. S. BURTON
MONICA OLSON
THOMAS E. GIBBS
VERNON C. GAUHTT
OWING L. ARMSTRONG
PAUL D. O'CONNOR
S. LEE HAMCOCK
DAVID L. OSIAT
WILLIAM R. HANSEN
DEBRA DISON HALL
ANTON N. NATSIS
GEORGE J. BERGER
MICHAEL C. PRUTER
MICHAEL M. CERRINA
RICHARD E. STINEHART
STEPHEN R. THAMES
JOHN K. MCKAY
DANA I. SCHIFFMAN
ANNE E. KLOKOW
NEIL N. GLUCK
DAVID W. WENSLEY
GARY S. MCKITTERICK
PATRICK J. GRADY
RAY B. GLINER
ANTHONY S. SOUZA
CHARLES M. KENWORTHY
ANTHONY J. OLIVA
MARK J. GRUSHKIN
ROBERT M. HAMILTON
DAVID R. ZARO
JANET A. WINNICK
ROBERT R. BARNES
VINCENT M. COSCINO
JEFFREY R. PATTERSON
JEROLD B. NEUMAN
MARK R. HARTNEY
JOHN M. TIPTON
CHERYL S. PRELL
JOHN G. DAVIES, OF COUNSEL
JOE M. DAVIDSON, OF COUNSEL
*A LAW CORPORATION

MICHAEL J. MURPHY
CRAIG D. SWANSON
BRADLEY N. SCHWEITZER
GREGORY G. GORMAN
ALAN J. GORDON
PAMELA L. ANDER
REBECCA G. GUNDZIK
ADELA CARRASCO
MARTHA K. GUY
GEORGE W. KUNEY
DANIEL L. GOODKIN
SAMUEL H. STEIN
CATHERINE M. PAGE
SCOTT P. SCHOMER
KELLI L. FULLER
LESLIE TUCKER FISCHER
MICHAEL J. KIELY
DAVID A. SWARTZ
MICHAEL S. GREGOR
A. KRISTINE FLOYD
ROBERT A. LURIE
STEPHEN J. KEPLER
SUSAN G. SPIRA
JENNIFER M. CASBY
CYNTHIA A. OBER
MICHAEL A. ALVARADO
HADAR GOLDSTEIN
MARY KAY RUCK
ERIC J. SHELBY
SUSAN E. GRAHAM
MARTIN L. TOGNI
DAVID T. HATHAWAY
CHRISTOPHER G. LUND
LORAIN L. PEDOWITZ
RANDY J. MYRICKS
JOHN G. PIANO
KAREN L. LAWLER
MARK J. HATTAM
MICHAEL R. FARRELL
STEVEN C. WELLINGTON
SALLY S. COSTANZO
ANN M. MAAS
TODD E. WHITMAN
ALLISON L. MALIN
REON ROSKI-AMENDOLA
ALLISON FONG GREENBERG
PAMELA M. EVERETT
JEFFREY M. STRUG
KATHRYN D. HORNING
FRANCIS N. SCOLLAN
JORDAN M. FISHMAN
TRACY L. SILVA
DARRIN A. MANISOG
VEENA D. PERSAUD

Mr. Hadar Plafkin
City of Los Angeles
Department of City Planning
Environmental Review Section
221 North Figueroa street, Room 1500
Los Angeles, California 90012

Re: Harbor Gateway Center Draft EIR; EIR No. 96-0090-SUB

Dear Mr. Plafkin:

We represent the owner of the property at the southeast corner of 190th Street and Western Avenue in the City of Los Angeles immediately adjacent to the Harbor Gateway Center.

On behalf of our clients we have been asked to provide you with comments to the Harbor Gateway Center Draft Environmental Impact Report (DEIR). Our client is concerned with the potential environmental effects of this project relative to both its property and the area in general.

In order to provide you with comments in a coherent manner, we have set forth our specific concerns in a detailed format which identifies the specific pages or sections of the DEIR to which the comments relate.

However, prior to providing the specific analysis we feel it is important to set forth some of the general concerns which we have. To this end, we believe the DEIR to be inaccurate regarding the project description and many significant environmental impacts of the proposed project, including but not limited to, alternatives analysis, cumulative impacts, traffic and parking impacts, as well as, noise and air quality impacts.

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 2

As an initial comment, an alternative site analysis is completely absent in the DEIR, and while alternative project analyses are detailed, the analysis provided concerns a "Master Plan Block Alternative" which is both infeasible and does not provide a true alternative to the proposed project. In fact, the DEIR refers to this alternative as one which does not avoid or substantially reduce any project impacts as is required by the CEQA Guidelines.

Additionally, one of the most important concerns of the project is the ability to provide adequate workable parking. This is not even addressed in the DEIR. The proposed supply of 2,200 parking spaces is significantly below code requirements and significantly below peak parking demands, and have not adequately been evaluated in the DEIR. Further, the parking analysis only addresses parking for Area 1 with no analysis of parking demand or code required parking for Area 2.

As a final general comment, this project provides substantial concerns relative to its traffic impacts. In this regard, the traffic analysis does not include the analysis required in the Congestion Management Program by the Los Angeles County Metropolitan Transit Authority and is also required in the City of Los Angeles Guidelines for Traffic Impact Studies. Therefore, much of the needed data with regard to the analysis of traffic impacts is not present within the context of the DEIR, and while this is not the only deficiency relative to the analysis of traffic impacts, it is a significant omission which we believe needs to be corrected.

The foregoing general comments are meant to provide a flavor of the more specific analysis which is set forth below, and is not intended by any means to be an exhaustive listing of the general inadequacies of the DEIR, but rather to provide a background for the following specific comments.

- | | |
|------------|---|
| Page 53 | The Project Description refers to a Vesting tentative tract map, without reference to the map number or the number of parcels to be created. The EAF prepared by the project applicant refers to Tract 52172; if this is the Vesting tentative tract map, then it should be referenced and explained. A copy of the tract map should be included as part of the DEIR. |
| Page 65-66 | The DEIR states that a total of 2,418,938 sq. ft. would be demolished on the project site, including 624,519 sq. ft. in the 40-acre "Area 1." It is our understanding that approximately 640,000 sq. ft. has already been demolished in this area, and that demolition activities are continuing. Therefore, only the 1,794,419 sq. ft. of buildings in Area 2 currently exist on the project site; some of this space may have been demolished, or may be planned for demolition in the near future. The DEIR should be revised to reflect the current conditions on the project site. |
| Page 82-87 | The related projects list in the DEIR does not sufficiently detail all related projects. Cumulative development missing from the related projects list includes 91,100 sq. ft. of office space, 466 dwelling units, 125 hotel rooms, 249,200 sq. ft. of manufacturing uses, a 48 acre golf course and 55,000 sq. ft. of retail uses. |

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 3

Thus, cumulative impacts are understated throughout the DEIR (particularly in traffic, air quality, noise, and utilities).

- Page 106 The DEIR overestimates the emissions generated by existing mobile sources. These emissions are based on 8,560 vehicle trips, which is the trip generation based on ITE rates applied to 2,419,000 sq. ft. of warehousing. As mentioned above, a maximum of 1,794,419 sq. ft. actually remain on the site; therefore, it would be impossible for the site to generate this level of emissions. Additionally, Section 15125 of the CEQA Guidelines states that the environmental setting is "a description of the environment in the vicinity of the project, as it exists before the commencement of the project" (emphases added). As such, existing emissions should be based on the traffic generated by existing warehousing operations on the site, not the potential re-use of all 2,419,000 sq. ft. as warehousing -- particularly when the buildings are in the process of being demolished, only 1.8 million sq. ft. of buildings remain, and it is unknown how much space will be left after demolition activities are completed.
- Page 112 As discussed above, existing emissions are overstated in Table 13. Net impacts of the proposed project on air quality are understated. Impacts should be recalculated with a realistic estimate of existing emissions.
- Page 165 Existing noise generation is also overstated, based on vehicle trips which do not currently exist. Therefore, net impacts on the ambient noise environment are understated. Impacts should be recalculated with a realistic estimate of existing noise generation.
- Page 168 Mitigation Measure No. 7 is infeasible, because the project applicant cannot impose these requirements on other property owners along 190th Street, Western Avenue, and Normandie Avenue. Therefore, this project would have significant unmitigated noise impacts on these properties.
- Page 187, 193 The section on Relevant Land Use Policies refers to the proposed General Plan Framework. The DEIR should be revised to reflect the fact that the Framework has now been adopted.
- Page 199 The statement under (3) Traffic Related Impacts that "neither air quality nor noise effects associated with the increase in motor vehicle traffic would cause an exceedance of an established air quality or noise threshold" directly contradicts the noise section (page 166). It is stated on that page that, because noise levels along major roadways exceed clearly acceptable levels, any increase in traffic-related noise associated with the project is considered to have an adverse effect, and these impacts would be considered potentially significant. Consequently, this would result in potentially significant land use compatibility conflicts related to project traffic.

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 4

Page 225

Appendix F does not adequately document the demand for parking on site. It merely assesses code required parking requirements and applies undefined internal capture rates and hourly adjustments to reflect shared use of spaces and incorrectly concludes that the peak demand will be 1,800 spaces. Appendix F calculates the number of spaces required by code for the shopping center/theater component of the proposed project as 2,520 spaces, not 2,380, as stated in Section IV. H. The proposed supply of 2,200 spaces is significantly below code requirements and significantly below the peak parking demands, which have not been adequately evaluated in the DEIR. As noted above, the Appendix F analysis of parking does not assess demand, it assesses code requirements and presumes that the two are equal. Application of ITE Parking Generation rates to the stand alone uses results in the total demand of 3,771 spaces on weekends, as opposed to the 2,520 total of code requirements. It is also not correct to apply both an internal capture rate and a shared parking adjustment to the stand-alone parking rates. If the internal capture rate is intended to indicate that 20% of the restaurant parking demand is provided by parking required for the retail uses, the further application of hourly reductions in the parking demands to reflect shared use of spaces, double discounts this same phenomenon. If the same parking space is occupied by someone who came to shop and then stays to dine, it means that parking space is occupied longer and when the next retail customer comes to park in the retail parking space, it will be occupied by a restaurant patron and the retail parker will park in a restaurant space. The increase in parking duration by persons staying on site to visit two establishments offsets the internal capture rate reduction in parking ratios that the DEIR authors have assumed. The parking analysis is incorrect in not identifying a significant shortage of parking in the retail/theater component of the proposed project and fails to disclose the impacts of this parking shortage or the mitigation measures to correct it.

Further, the parking analysis only addresses parking for Area 1; no analysis of parking demand or code-required parking is provided for Area 2. Therefore, it cannot be ascertained from the DEIR whether Area 2 parking would meet City code requirements or the demand for parking generated by the proposed uses. The DEIR should be revised to include this information.

Page 230

The traffic analysis is based on the presumption that there will be three rail crossings along Normandie Avenue to serve as project access points, but does not disclose the turning movements into and out of each of the access points. It only provides data on one of the access points along Normandie Avenue. Section IV. H. acknowledges the possibility that approval for these additional rail crossings may not be obtained, but incorrectly concludes that concentration of all traffic at one access point on Normandie would not cause additional impacts or require additional mitigation measures. With only one access point on Normandie, instead of the three assumed in the traffic analysis, the single access intersection could

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 5

become overly congested and result in a shift of project traffic to alternate access points. Or it could cause a major bottleneck on Normandie Avenue. Without explicit traffic data and level of service calculations at all three driveways and with the single-driveway alternative, it is not possible to draw the conclusion that the single driveway could function adequately and would not require additional mitigation. The analysis of all driveways under all potential access scenarios should be updated and added to the traffic study. It should also be presented for the peak holiday shopping season to assure the public that the access plan will be adequate during the shopping season.

Page 256, 262, 273 The electricity, natural gas, and water consumption for existing uses is based on the actual consumption in 1995; this approach should be used throughout the document (existing traffic generation should be based on the actual current uses, not the potential re-use of the site).

Page 289-290 It appears that a Phase II assessment has been done for the retail portion of the site (Area 1), but no Phase II assessment has been done for the rest of the site (Area 2). If the site requires major remediation, this could take several years, which would affect the start date for construction and ultimately, the buildout date. Finally, the discussion of Area 2 impacts (pages 299-300) is pure speculation. Since no Phase II Assessment has been completed for Area 2, the discussion of impacts is subjective and unclear.

Page 344 The No Project Alternative is misleading to the reader. The 2.4 million sq. ft. of existing industrial and warehouse buildings would not remain, as approximately 640,000 sq. ft. have already been demolished, and demolition activities are ongoing. Therefore, these buildings could not be reused, and this alternative would have substantially reduced impacts in comparison with the proposed project. This alternative needs to be rewritten to reflect the amount of space which will actually remain on the site following demolition activities.

Additionally, this alternative (page 345) states that "Current on-site uses generate an estimated 8,560 daily vehicle trips." This statement needs to be substantiated, as the DEIR previously stated (on page 79) that only about 380 employees remain on site. It seems unlikely that the activities of 380 employees could generate anywhere near 8,560 daily trips.

Page 348 The Master Planned Block Alternative is not an alternative to the proposed project. Development on the McDonnell Douglas property would remain essentially the same as the proposed project, with the same impacts. This alternative places the burden of mitigating the McDonnell Douglas project impacts on the adjacent property, as any reduction of impacts is achieved by the alternative land uses on the International Light Metals site. This alternative would also include the continuation of 195th Street through the International Light Metals site

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 6

to Western Avenue; however, the potential impacts of this extension are not addressed.

Section 15126(d)(1) of the CEQA Guidelines states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." This alternative does not avoid or substantially reduce any project impacts. The DEIR actually states this; it only claims to reduce the combined impacts of both projects. However, it is the impacts of the adjacent project which are reduced, not the McDonnell Douglas project. Therefore, pursuant to Section 15126(d)(1) of the CEQA Guidelines, this alternative should not be considered in the DEIR.

Further, CEQA Guidelines Section 15126(C) states that "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." The Master Planned Block Alternative is speculative in that Lockheed Martin, the project applicant for the International Light Metals property, does not intend to participate in such a development. An EIR need only consider a range of feasible alternatives, not all possible alternatives. Given that Lockheed Martin has no intention or desire to participate in a coordinated master planned alternative with the McDonnell Douglas property, the suggested alternative is not considered feasible, and should be deleted from the DEIR.

Page 376

The DEIR fails to clearly identify which alternative would be considered the Environmentally Superior Alternative. It is not clear why the Reduced Intensity Alternative would be superior to the Golf Course Alternative. It is not clear whether the DEIR is stating that the Master Planned Block Development Alternative would be environmentally superior to the Reduced Intensity or Golf Course Alternatives. In either case, the Master Planned Block Development Alternative should be deleted, because it does not avoid or substantially reduce any project impacts - it only reduces the impacts due to development on the adjacent property, and translates that to "reduction of the combined impacts" of both projects. The DEIR should be revised to clearly identify which alternative would result in the fewest environmental impacts, and thus be considered the Environmentally Superior Alternative.

Comments on Appendix F

no page

The traffic analysis does not include the analysis required in the Congestion Management Program (CMP) by the Los Angeles County Metropolitan Transportation Authority (MTA) and as required in the City of Los Angeles Guidelines for Traffic Impact Studies. The CMP requirements include the analysis of all CMP arterial monitoring intersections where the proposed project

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 7

will add 50 or more peak hour trips and the analysis of all freeway mainline locations where the proposed project will add 150 or more peak hour trips. The CMP also requires that the number of transit trips to be added to transit routes in the vicinity of the proposed project be disclosed. City of Los Angeles guidelines also require that the calculation of CMP "credits" and "debits" which will be accrued by the City in approving the proposed project be reported. The CMP required analysis should be added to the traffic study.

- no page The traffic analysis does not address the potential for diversion of traffic from the arterial streets to adjacent residential streets to avoid congestion. The DEIR should address the impacts of the project on congestion on Normandie Avenue and the potential for spillover to residential streets.
- Page 5 The project description states that the plan consists of a 450,000 square foot shopping center. This description should clarify the fact that the center includes 30,000 square feet of restaurants, which has parking and trip generation implications in and of itself which are discussed later.
- Page 5 The project description states that "until recently, the buildings were used for aircraft manufacturing and assembly." The date when they were last in use should be specified because LADOT guidelines for traffic impact studies clearly state that "any claim for trip credits for an existing active land use which is applied to calculate net new trips requires that the existing use was in place at the time of the existing base year traffic counts. Generally for CEQA purposes this means the existing use must have been in place for 6 months within the past 2 years." It is unlikely that the aircraft manufacturing and assembly was in full operation for 6 months within the last 2 years and the project should therefore not be allowed to claim a credit for the aircraft and manufacturing space.
- Page 5 The project description also states that "currently, the buildings are used as a warehousing and distribution facility." It is unlikely that all 2,419,000 square feet are currently actively used for such purposes given that some of the buildings have been torn down. The DEIR author's 1996 existing conditions traffic counts (Figures 3a and 3b) confirm this fact by illustrating 0 trips turning into and out of the site at the three main project access points. The DEIR traffic study should not take a credit for existing trip generation at the site without substantiating that there is such trip generation at the site. If it is currently actively utilized, driveway counts should be provided to document the existing trip generation of the site.
- Page 5 The project description states that "additionally, access via an extension of 195th Street across the adjacent vacant site to the west, formerly used by Lockheed Aircraft, could be provided as part of the redevelopment of that site." This reference should be stricken from the project description and deleted from the Site Plan (Figure 2) as they are inconsistent with Lockheed-Martin's proposed plans

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 8

for their site. The DEIR should not confuse the public, nor decision makers, with the allusion to potential additional access to this site which is not feasible.

Page 7 The description of the main project driveway on 190th Street opposite the southbound San Diego Freeway off-ramp notes that "some turning movements to and from this driveway could be restricted." What does this mean? Has Caltrans approved the location of a driveway directly opposite the ramp terminal and have they concurred in full access to/from this driveway? The traffic analysis is based on the assumption that all turning movements will be allowed at this location. It should also identify the potential impacts associated with no access at this location or restricted access, as implied in the project description.

Page 11 The DEIR notes that new counts were conducted and that they were adjusted to reflect full operation of the project site as a warehouse facility. The dates on which the counts were taken should be disclosed. The fact that the DEIR acknowledges that the existing counts had to be adjusted to "reflect full operation of the project site as a warehouse facility" confirms that is not currently fully operational and therefore should not be subject to a trip credit for existing trips generated by all 2,419,000 square feet of space.

Page 14 The description of public transit service in the project vicinity gives the impression that the site is well served by public transit. It claims that the two bus lines adjacent to the project site "offer extensive access to adjacent South Bay communities", but these two lines only provide service at half hour headways and one provides no midday, night or weekend service, hardly providing extensive public transit access. The limited transit access is significant to the traffic analysis because in the mitigation measures section of the DEIR, the claim is made that Transportation Demand Management programs will reduce trip generation by 15 percent, with no commitment by the project applicant to enhance transit service.

Page 21 There are several comments applicable to the trip generation formulas applied to the proposed project land uses. Two of the formulas contain errors. The daily trip formula for Industrial Park should not include the Ln and should read " $T=4.949(A) + 765.587$." The daily trip formula for Office Park should include a Ln and should read " $Ln(T) = 0.835Ln(A) + 3.435$." These errors should be corrected.

The source and use of the Movie Theater trip rates is questionable and could understate the trips generated by the theaters. There is no daily per-seat trip rate provided by ITE for theaters. The daily rates are based on the number of movie screens and vary from 153.33 trips per screen for the one theater studied on a weekday to 529.47 trips per screen based on three theaters studied on a Saturday. The PM peak hour trip rate use in the analysis is the average rate based on two

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 9

studies conducted by ITE. The average rate is 0.06 trips per seat, but the range of the two studies was 0.04 and 0.09. Given the higher-than-average interest in movie going in southern California, it could be argued that something above the average of two studies should have been used. It would probably have been more reasonable to develop assumptions regarding the movie screening schedules and develop an estimate of peak hour trips. For example, if the theater complex has 12 screens at an average seating capacity of about 350 seats, it could be estimated that during the PM peak hour three movies might be starting and three ending. At an average weekday attendance of 50% capacity (175 attendees), and assuming 2.5 persons per car, these movies would generate 210 inbound cars and 210 outbound cars (compared to the 154 in/86 out in the DEIR). The DEIR numbers are more indicative of two movies beginning and one ending during the peak hour. Is this a reasonable assumption for a 4,000 seat theater complex?

The Shopping Center and Theater trip generation potential on a weekend should be disclosed, as the trip generation of the site is likely to be highest on weekends. The ITE rates for a shopping center on a Saturday indicate that the 385,000 proposed center will generate 21,325 daily trips. The Saturday trip rates for the movie theaters indicate the potential for 6,355 daily trips (assuming 12 screens). This would result in the total site trip generation from just the retail and theater components totaling 27,680 on a Saturday 30% more than the reported trip generation for the entire 2.967 million square foot development on a weekday. The weekend peak hour trip generation potential of the site should also be disclosed and the levels of service at project access points and nearby intersections evaluated to determine if the project will require additional mitigation measures based on the weekend peak hour. The Saturday peak hour trip generation of the shopping center will be 2,095 trips and the Saturday peak hour trip generation of the theaters will be 1,374 trips based on ITE rates (assuming 12 screens). If these peak hours coincided, the Saturday peak hour trip generation would total 3,469 trips, 92% more than the number of trips upon which the PM peak hour analysis was based. Midday conditions on weekends in the vicinity of the project are likely to be worse than those on weekdays, and this has not been disclosed to the public. Conditions during the peak shopping season would be even worse. The City of Los Angeles might want to require additional mitigation measures to reduce weekend impacts (e.g., restricting the number of simultaneous screenings or hours of matinees), but the impact have not been disclosed by the DEIR.

The project description and its resultant traffic analysis implies that the 30,000 square feet of restaurant space proposed as part of the project is part of the shopping center. However, the project site plan (Figure 2) does not indicate an enclosed shopping center with a food court, but rather a number of stores open to the parking lot, with about seven stand-alone buildings along the arterials. If these stand-alone buildings include the 30,000 square feet of restaurant space, they should be treated in the traffic analysis as such and the trip generation potential

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 10

and impacts of 30,000 square feet of stand-alone restaurants fully disclosed. Treating the 30,000 square feet of restaurants as shopping center square footage results in the estimate that they will generate 3,330 daily trips. If the ITE rates for high-turnover sit down restaurants is applied to this same square footage, they would be estimated to generate 6,160 daily trips. If they are evaluated as fast food restaurants, they would generate 16,575 trips. Thus the impacts of the 30,000 square feet of restaurants in the proposed project can vary dramatically and should be evaluated and disclosed.

Page 22

In paragraph one, there is a reference to Appendix A, which separates the project trip generation by phase. Appendix A provides information on the Phase 1 of the proposed project, which includes only the theater and retail components of the proposed project. There is no discussion provided in the Appendix F. Traffic Analysis or in Section IV H, the Transportation/Circulation impact analysis of the DEIR with regard to the impacts of Phase 1 of the project. The data included in Appendix A appears to contend that the Phase 1 shopping center and theaters will generate less traffic than the warehouses displaced from the site and that Phase 1 will therefore result in no impacts. This analysis is incorrect. As noted above, it is unlikely that the trip credits for existing uses on the site are applicable and the impacts of the project on a weekend have not been evaluated. The Phase 1 shopping center project should be separately evaluated, including its weekend impacts, so that the public and decision makers can see the project's impacts and determine which of the project mitigation measures should be required as part of the Phase 1 project.

Page 23

The project traffic generation data provided in Table 5 justifies several comments. The traffic generation for the shopping center component of the project appears to be incorrectly calculated. The application of the shopping center trip generation formulas shown on page 21 in Table 4 to 385,000 square feet ($A=385$) results in a daily trip generation estimate of 16,410, not 15,010, a total AM peak hour trip generation estimate of 359, not 337, and a total PM peak hour trip generation of 1,549, not 1,423 as reported in Table 5. The shopping center gross trip generation is understated by about 9%.

The ITE trip generation manual includes data on By-Pass trips for the following types of land uses; shopping centers, fast food restaurants, service stations, supermarkets, convenience markets. It does not provide any data on By-Pass trips for movie theaters. Movie theaters are a destination-oriented land use. People make plans to go to movies. They do not just decide on the spur of the moment to pull into the theater as they might decide to pull into a market or fast food outlet. The 10% reduction in theater trips assumed in Table 5 due to By-Pass trips should not be included in the project trip generation estimate.

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 11

As discussed earlier, the inclusion of trip credits for the 2,419,000 square feet of warehouse space on the project site is questionable because it is not clear that it all still exists and that it is all generating traffic. As noted earlier, empirical data regarding the existing site trip generation should be included in Table 5, if it is indeed generating existing trips, not a hypothetical estimate of how many trips 2,419,000 square feet of warehouse space could generate if it all existed and were all occupied. The application of this trip credit reduces project trip generation by 29% on a daily basis and 39% in the PM peak hour and results in a significant underestimation of the potential impacts of the proposed project.

Page 24

Table 6 provides a single directional regional trip distribution for the proposed project. This is not a realistic estimate of the project's trip distribution. The shopping and theater components of the project are likely to have a trip distribution that is more locally oriented toward the South Bay Area, whereas the office park and industrial park land uses are much more likely to have a trip distribution that is more regional in nature. Employees of the office park may commute from Orange County or East Los Angeles, but movie goers are not likely to drive that distance. There should be two separate sets of trip distribution assumptions presented; one for commute trips and one for shopping/theater trips. Using the single trip distribution may underestimate the length of trips generated by the site and could affect the air quality analysis, which is partially based on vehicle miles traveled.

Page 25

The project traffic volumes shown on Figures 4a and 4b raise several questions. It appears that the percentage of traffic oriented toward the freeway system is 35-41% of project trips in the AM peak hour (531 inbound trips are illustrated exiting the freeway and 59 outbound trips are shown entering the freeway on Figure 4a) and 42-49% in the PM peak hour (265 inbound trips and 527 outbound trips access the freeways in Figure 4b). An explanation should be provided as to why these percentages vary by time of day, given the single trip distribution referenced in Table 6. It also appears that the assignment of project trips to the network sends them in some very circuitous routes, which don't make sense. For example, Why does most of the project-bound traffic on the southbound San Diego Freeway exit at the ramp north of Western in the AM and none of it exits there in the PM? Why do project-bound trips exit the northbound San Diego Freeway at the Crenshaw/182nd Street exit and turn north away from the project and disappear? Why is outbound project traffic shown entering the southbound San Diego Freeway from southbound Crenshaw Boulevard? Why is no project traffic shown entering the southbound San Diego Freeway at the Normandie on-ramp, the closest southbound on-ramp to the proposed project? These questionable project trip distributions call into question the validity of the project level of service calculations and the entire impact analysis.

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 12

Page 27

The parking analysis suggests that the DEIR has evaluated the parking demand, but the analysis does not assess peak parking demands, it assesses the code requirements. This analysis suggests that if the project provides the amount of parking required by code, then the peak parking demand will be satisfied. This assumes that the code accurately reflects peak parking demands. The ITE publishes a Parking Generation Manual similar to the Trip Generation Manual used by the DEIR authors to calculate the project trip generation. Formulas to calculate peak parking demands are published by land use. The peak parking demand formulas for weekends for the three relevant land uses are:

Theater: $P = 0.50(X) - 322.0$, where X = number of seats

Restaurant: $P = 36.73(X) - 150.0$, where X = 1,000 square feet

Shopping Center: $\ln(P) = 1.261\ln(X) - 0.365$, where X = 1,000 square feet

Applying these formulas to the proposed project results in the following peak parking demands:

Theater:	1,678
Restaurant:	952
Shopping Center:	1,141
Total Stand Alone Parking Demand =	3,771

This peak stand alone rate of 3,771 spaces compares to the 2,520 spaces reported in the DEIR as the sum of the stand alone City code requirements. The DEIR should be modified to provide an assessment of the parking demands on weekdays, weekends and at the peak holiday shopping season. The DEIR should also disclose how this peak parking demand compares to the proposed supply of parking. The DEIR Appendix F does not disclose the number of parking spaces provided by parcel or phase of development, so it is impossible to know if parking will be adequate or not.

Page 27

The description of project access points discusses new driveways on 190th Street and Normandie Avenue, but details of the number of driveways, locations of driveways and peak hour turning movements at the driveways are not provided. Additional details are required to assure the public that these driveways will operate at satisfactory levels of service in the peak hours on typical weekdays, weekends and at the peak holiday shopping season.

The project description assumes that new railroad crossings will be approved as access points to the proposed project. Are these new access points assured? Has the railroad and the Public Utilities Commission granted approval for these new railroad crossings? If no such formal approval has been obtained, the project traffic analysis should be re-analyzed assuming only access at existing access

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 13

points, so the public can be assured that the concentration of project-generated traffic at a reduced number of driveways will work satisfactorily.

- Page 28** The project proposes six signalized access points, four of which would be new or relocated signals. The traffic analysis should quantify the impacts of these new traffic signals. Warrants for the signals should be provided to show that they are justified. The impact of the new signals on traffic progression along 190th Street and Normandie Avenue should be assessed. The levels of service at the new signals should be included in the traffic analysis so the public knows how they will operate and decision makers can determine whether or not additional mitigation measures are required at these new signalized intersections. Two of the four project access points for which level of service calculations were performed were shown to operate at LOS F and required mitigation. Information should be provided for the other two signalized access points. As noted earlier, the driveways and signalized access points should also be evaluated for the peak holiday season. The 190th Street/Project roadway intersection is described as operating with a relocated traffic signal. The DEIR should disclose the location from which this traffic signal is being relocated and should assess the secondary impacts of this signal relocation.
- Page 29** The discussion of the model used to forecast traffic should be clarified. The text states that the City of Los Angeles General Plan Framework model was the basis for the travel forecasts in this DEIR. The text then discusses the SCAG/LARTS model's ability to forecast HOV lane demands and transit ridership. The Framework model does not have the ability to explicitly forecast HOV volumes and does not include a transit network, so it is confusing as to why this discussion is included in the DEIR. It implies that HOV and transit forecasting was done, but it is not clear that was the case. The text notes that the Framework model does not provide the level of detail necessary to forecast individual turning movements at specific intersections with acceptable precision. The DEIR does not disclose the methodology that was used to develop intersection turning movements. Were they taken directly from the model or was the model used to forecast growth in traffic which was then added to existing turning movements counts. The methodology is not adequately described to allow a reviewer to ascertain its validity.
- Page 35** The "without project" traffic volumes shown on Figures 6a and 6b illustrate that the northern portion of the project site is not forecast to generate traffic without the proposed shopping center/theater project and that the Phase 1 of the project should not receive any credit for displaced warehouse space. The main driveway to the shopping center portion of the project is shown to have zero movements into/out of the site in Figures 6a and 6b. This is further confirmed by comparing the volumes on Figures A-1 a and b to those on Figures A-2 a and b in Appendix A, where the Phase 1 impacts are addressed. The "without project" forecasts are

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 14

identical to the "with project" forecasts at the three project access points which do not serve the shopping center and the shopping center trips are added at the single driveway on 190th Street which is included on these Figures. The Phase 1 traffic analysis should not include trip credits for displaced traffic.

Page 36

One of the key conclusions of the traffic analysis on page 36 reads "the proposed project, prior to mitigation, could have significant traffic impacts at thirty intersections during the morning and/or evening peak hours." This represents three fourths of the intersections evaluated and illustrates the magnitude of the traffic impacts associated with the proposed project, even given the fact that the trip generation calculations include a questionable trip credit which reduces the peak hour trip generation by 39%.

Page 42

Table 11 shows that the area freeway system will be heavily congested with or without the project and that the project will significantly negatively impact two freeway mainline segments on the San Diego Freeway and one mainline segment on the SR 91 Freeway, in spite of the fact that project trip generation has been reduced by 39% through trip credits. The text states, "the project will add incrementally to these insignificant cumulative impacts." What does this mean? The text then states, "the project will have significant impacts at up to four locations during the morning peak hour and in the opposite direction at the same four locations in the PM peak hour." This statement is not consistent with the data presented in Table 11. Which is correct? The final sentence on this page states, "These will be addressed by the overall Congestion Management Program (CMP) improvements, such as those included in the mitigation section of this report." What does this mean? There is nothing in the mitigation section of the DEIR which refers to CMP improvements and there are no mitigation measures proposed for the freeway segments. According to the discussion on page 29, the background traffic forecasts were based on a traffic model that includes all future freeway improvements included in the SCAG/LARTS Model and/or City of LA General Plan Framework Model. The DEIR should disclose that the significant impacts on the freeway system identified as attributable to this project will not be mitigated because the freeways were assumed to be fully built out in the baseline forecasts.

Page 45

The traffic analysis suggests that the congestion on the freeway mainline will result in back-ups that will extend onto the on-ramps. It concludes that this eliminates the need to study the ramps, when it should have concluded that this requires the study of the implications of the blockage of the on-ramps in terms of the potential diversion of project traffic to alternate arterial routes and the further worsening of arterial intersection levels of service that this will cause.

Mr. Hadar Plafkin
City of Los Angeles
March 21, 1997
Page 15

- Page 46 The mitigation measure related to the City of Los Angeles TDM Ordinance should be revised to read, "It [the Ordinance] *shall* be followed in the design and construction of the project site and buildings."
- Page 47 It is unrealistic to forecast that 15 percent or more of the peak hour traffic generation of the industrial park/office park component of the project will be eliminated, without any specific commitments from the project applicant to implement some Transportation Demand Management measures.
- Page 47 The bus transit improvements mitigation measure is ineffective as stated and would be difficult to monitor through the mitigation monitoring program without a specific commitment as to how the project applicant is going to improve transit service. What is meant by the phrase "this project should work with the appropriate transit districts to improve transit service to the site?" A specific program to improve transit service should be identified and the specific actions that the project applicant will take to support the services (e.g., subsidization of employee bus passes) should be identified.
- Page 52 The DEIR authors do not note whether any attempt has been made to coordinate the mitigation measures with the adjacent jurisdictions and which if any are acceptable to the adjacent jurisdictions. The public and decision makers have no way of knowing the likelihood as to which mitigation measures outside the jurisdiction of the City of Los Angeles will be implemented. The traffic study does not even indicate which intersections and which mitigation measures are solely within the City of Los Angeles. It is impossible for the public to determine how many significant impacts are likely to remain if this project is approved.

As demonstrated by the foregoing comments, the DEIR is significantly deficient in several important areas -- most notably, traffic -- which we believe requires the revision and recirculation of the DEIR.

Very truly yours,


Jerold B. Neuman

of

ALLEN, MATKINS, LECK, GAMBLE & MALLORY

JBN/lah

cc: Thomas C. Wolff, Jr.
 Thomas J. Quinn
 John W. Smith
 John C. Peterson, Esq.
 James DeNapoli, Esq.

**LOS ANGELES UNIFIED SCHOOL DISTRICT****Real Estate and
Asset Management Branch**

355 S. Grand Avenue, Suite 500
Los Angeles, CA 90071
Telephone: (213) 633-7581
FAX: (213) 633-7546

FAX TRANSMITTAL

To: Hadar Plafkin

Addressee's FAX number: 580-5542

From: Joan Friedman

Number of pages (including this form): _____

Description of document transmitted: Harbor Gateway Center -
Comments to DEIR

Comments: Hard copy & technical data to follow

PLEASE ADVISE IMMEDIATELY IF YOU DO NOT RECEIVE ALL PAGES
(213) 633-7581

Los Angeles Unified School District

Facilities Services Division

SINCEY A. THOMPSON
Superintendent of Schools

Environmental Review File
Harbor Gateway Center/190th Center

BETH LOUARGAND
General Manager

BOB NICCUM
*Director of Real Estate
and Asset Management*

March 24, 1997

Hadar Plafkin, Project Coordinator
Department of City Planning
221 North Figueroa Street, Room 1500
Los Angeles, CA 90012

Dear Mr. Plafkin:

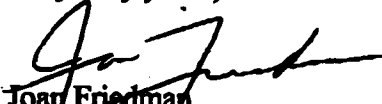
Re: Harbor Gateway Center

Thank you for the opportunity to review the Environmental Impact Report for the above-referenced project.

Attachment A has been prepared by the District's Environmental Health and Safety Branch staff. It discusses the impact that project construction will have on air quality at One Hundred Eighty-sixth Street School.

If we can provide any additional information please contact me at (213) 633-8986.

Very truly yours,


Joan Friedman
Environmental Review Unit

JF:mn

Attachment

c: Mr. Kiriya
Mr. Thompson
Ms. Louargand
Ms. Wong
Ms. Ogawa
Ms. Hoekzema

c:\winword\harbo.doc

INTER-OFFICE CORRESPONDENCE
Los Angeles Unified School District

ATTACHMENT A

TO: Joan Friedman, Realty Agent
Real Estate and Asset Management Branch

FROM: Bill Piazza
Environmental Health and Safety Branch

SUBJECT: Harbor Gateway Center: DEIR

Date
March 18, 1997


In response to your request to provide comments on the air quality element for the above referenced project, the following is provided.

Upon review of the available documentation presented in the Draft Environmental Impact Report (DEIR) staff notes that the applicant readily proclaims that average daily PM10 emissions associated with construction activities would produce "significant air quality impacts." Specifically referenced is the affect the project may have on our local school. As such, the applicant states that sensitive receptor locations in proximity of the proposed project (e.g., 186th Street School) could experience "increased dust levels" from site grading activities that "would constitute a significant air quality impact."

However, with the admission of the project's impact on local air quality, the applicant can only present a list of mitigation measures to "lessen the project's significant air quality impacts." Yet, with the implementation of these mitigation measures, project related emissions are reported to remain "significant and unavoidable."

Although the applicant admits significant impacts will occur during site development, nothing is offered to mitigate these impacts on our local school based population. It is alarming that the applicant offers no mitigation measures to minimize the degradation of local air quality and subsequent exposures to our students and staff. To underscore our concern, the California Air Resources Board reports that when inhaled, particulates expose children to adverse health effects such as "increased asthma attacks, reduced pulmonary function and increased risk of respiratory illnesses." In a recent staff paper prepared by the Environmental Protection Agency (U.S. EPA 1996), it was reported that short-term particulate exposures increased the likelihood of school absences due to altered lung function and increased respiratory tract irritation.

As a result, particulate emissions generated from construction activities are considered unacceptable and necessitate appropriate mitigation for students and staff who work and/or attend class at 186th Street School. The applicant, therefore, must effectively reduce particulate concentrations and minimize contaminant infiltration within occupied building structures. Staff recommends that the applicant implement the following offsite control measures to reduce project related impacts to a level of insignificance.



Joan Friedman

-2-

March 18, 1996

Offsite controls shall mean the installation of local air purification systems which exhibit a control efficiency of not less than 95 percent for particulates (≤ 10 microns). Additionally, outdoor ancillary structures used by students and staff during lunch and recess (i.e., tables and benches) shall receive periodic cleaning to minimize particulate deposition and subsequent reentrainment.

Please advise as to the disposition of this memorandum and subsequent response by the applicant. I can be reached at (213) 743-5086 should you have any questions or need additional information.

BP:bp



Approved: Dianne Doi, Acting Branch Director

LATHAM & WATKINS

ATTORNEYS AT LAW

633 WEST FIFTH STREET, SUITE 4000
LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE (213) 485-1234
FAX (213) 891-8763

PAUL R. WATKINS (1899-1973)
DANA LATHAM (1898-1974)

CHICAGO OFFICE

SEARS TOWER, SUITE 5800
CHICAGO, ILLINOIS 60606
TELEPHONE (312) 876-7700
FAX (312) 993-9767

LONDON OFFICE

ONE ANGEL COURT
LONDON EC2R 7HJ ENGLAND
TELEPHONE + 44-171-374 4444
FAX + 44-171-374 4460

MOSCOW OFFICE

113/1 LENINSKY PROSPECT, SUITE C200
MOSCOW, RUSSIA 117198
TELEPHONE + 7-503 956-5555
FAX + 7-503 956-5556

NEW JERSEY OFFICE

ONE NEWARK CENTER
NEWARK, NEW JERSEY 07101-3174
TELEPHONE (201) 639-1234
FAX (201) 639-7298

NEW YORK OFFICE

885 THIRD AVENUE, SUITE 1000
NEW YORK, NEW YORK 10022-4802
TELEPHONE (212) 906-1200
FAX (212) 751-4864

ORANGE COUNTY OFFICE

650 TOWN CENTER DRIVE, SUITE 2000
COSTA MESA, CALIFORNIA 92626-1925
TELEPHONE (714) 540-1235
FAX (714) 755-8290

SAN DIEGO OFFICE

701 'B' STREET, SUITE 2100
SAN DIEGO, CALIFORNIA 92101-8197
TELEPHONE (619) 236-1234
FAX (619) 696-7419

SAN FRANCISCO OFFICE

505 MONTGOMERY STREET, SUITE 1900
SAN FRANCISCO, CALIFORNIA 94111-2562
TELEPHONE (415) 391-0600
FAX (415) 395-8095

WASHINGTON, D.C. OFFICE

1001 PENNSYLVANIA AVE., N.W., SUITE 1300
WASHINGTON, D.C. 20004-2505
TELEPHONE (202) 637-2200
FAX (202) 637-2201

FILE NO. 0138950017

March 24, 1997

BY HAND DELIVERY

Mr. Hadar Plafkin
City Planner
Environmental Review Section
City of Los Angeles
Department of City Planning
221 North Figueroa Street
Los Angeles, CA 90012-2601

Re: Comments on Harbor Gateway Center Draft EIR (EAF Case No: 96-0090-
SUB(ZV)(CUB)(DA))

Dear Mr. Fisher:

On behalf of our client, McDonnell Douglas Realty Company, the Applicant for the Harbor Gateway Center project (the "Project"), we are pleased to provide the following comments on the Draft Environmental Impact Report (DEIR) for the Project.

In general, we feel that the DEIR is thorough, well written, and responsive to the requirements of the California Environmental Quality Act (CEQA). Our only comments on the document pertain to the need to update the DEIR's Project Description to reflect recent refinements in, and clarifications to, the proposed Project. As discussed below, the Project's refinements and clarifications described herein do not change the overall analysis and conclusions of the DEIR; but, rather, serve to provide a more current reflection of the proposal as it continues to be refined through project planning and engineering. Our comments regarding the Project Description are as follows:

Refinements to the Proposed Tentative Tract Map Attached is a copy of the draft Vesting Tentative Tract Map (TTM) to be submitted for the Project. The proposed TTM was recently updated to reflect refinements in the conceptual roadway system and lot configurations, and will be submitted to the City as a modification to the TTM Application. These refinements to the Project do not constitute a significant change under CEQA. The following summarizes the recent refinements to the TTM:

1. Circulation System - The most notable revision in the plan involves the proposed alignment of A Street. A Street was originally proposed to align along the northwest boundary of the site to offer shared access with the adjacent property, but the owner of such property has expressed no interest in such shared access. Therefore, the proposed alignment of A Street is shifted easterly to enable its northern terminus to align with the existing traffic signal at Denker Avenue on West 190th Street, thereby avoiding the need to relocate that signal. The northern portion of A Street, between C Street and West 190th Street, would be improved as a private easement. These differences related to A Street can be seen in comparing the attached draft TTM with Figure 10 -- Internal Circulation System of the DEIR. A revised Figure 10 should be included in the Final EIR.

Related to the realignment of A Street is a refinement to the plans for C Street. Its western terminus will occur as a cul-de-sac to facilitate the future extension of 195th Street from Western Avenue to Normandie Avenue as shown on the conceptual Alternative 2 plan (Master Planned Block Development) in the DEIR (i.e., the cul-de-sac would be removed to provide a through way). If this extension of 195th Street occurs, the northern segment of A Street, between C Street and West 190th Street, may be terminated. The proposed intersection of A Street and West 190th Street would remain to provide controlled access to/from the retail portion of the Project.

These refinements to the proposed circulation system do not constitute a significant change under CEQA, and do not alter the overall analysis and conclusions of the DEIR. The essence of the Project, as addressed in the DEIR, remains unchanged.

2. Retail Area Configuration - The easterly portion of the proposed retail center has been extended south to C Street. The total retail building retail floor area potentially would still not exceed the 450,000 square feet assumed for the impacts analysis of the DEIR. As such, this Project refinement would not alter the overall analysis and conclusions of the DEIR.

LATHAM & WATKINS
Mr. Hadar Plafkin
March 24, 1997
Page 3

Clarification Regarding Public Road Crossing of Existing Rail Lines - In addition to the proposed development of two new rail crossings, as shown in Figure 10 of the DEIR, approval of a public road crossing by the California Public Utilities Commission (PUC) will be sought for the existing crossing (shown in Figure 2 of the DEIR) on B Street just west of that Street's intersection with A Street. Such crossing is depicted on Figure 10, but needs to be appropriately labeled in the Final EIR.

We appreciate the opportunity to comment on the DEIR and look forward to the City's ongoing progress in the processing of the Project. Should you have any questions, please contact me at (213) 891-7930.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Anthony Shidme" with a small "for" written below it.

Dale Neal
of LATHAM & WATKINS

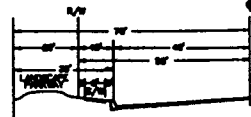
Attachment

cc: Tom Overturf, MDRC
Mario Stavale, MDRC
Lucinda Starrett, LW

[illegible]

**DRAFT INVESTING
TENTATIVE TRACT NO. 52172**

**IN THE CITY OF LOS ANGELES,
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
FOR SUBDIVISION PURPOSES ONLY**



Department of Water and Power



the City of Los Angeles

RICHARD J. RIORDAN
Mayor

Commission
CAROLYN L. GREEN, *President*
MARCIA G. VOLPERT, *Vice President*
JOSÉ DE JESÚS LEGASPI
JUDY M. MILLER
IRENE N. KISHI, *Secretary*

WILLIAM R. McCARLEY, *General Manager*
KENNETH S. MIYOSHI, *Assistant General Manager and Chief Engineer*
ELDON A. COTTON, *Assistant General Manager—Energy Services*
JAMES F. WICKSER, *Assistant General Manager—Water Services*
THOMAS M. McCLOSKEY, *Assistant General Manager—Marketing & Customer Service*
M. FAYE WASHINGTON, *Assistant General Manager/Chief Administrative Officer*
PHYLLIS E. CURRIE, *Chief Financial Officer*

March 20, 1997

Mr. Hadar Plafkin
Project Coordinator
City of Los Angeles
Department of City Planning
221 North Figueroa Street, Room 1500
Los Angeles, CA 90012

Dear Mr. Plafkin:

Comments on Draft Environmental Impact Report (DEIR) for
the Harbor Gateway Center (Project)

The Los Angeles Department of Water and Power (LADWP) welcomes the opportunity to comment on Project DEIR as requested on February 6, 1997.

LADWP's Energy Services Organization provides the following discussion for your consideration:

Electrical service will be provided in accordance with LADWP's rules and regulations. Facility construction may cause limited temporary impacts on the surrounding communities in the form of unavoidable noise, air pollution, and traffic congestion during construction.

LADWP's Energy Distribution Business Unit estimates the increase in demand due to this Project will have no adverse impact on the distribution system. However, the cumulative effects of this and other projects in the area may require LADWP to construct additional distribution facilities in the future. The Project will likely be supplied from LADWP's 34.5-kV distribution system with transformation to the Project's utilization voltage taking place at the project site.

LADWP's Water Services Organization provides the following comments:

Based on the estimated water demand of 269.4 million gallons per year as stated in the DEIR, this site can be supplied with municipal water by LADWP.

Water and Power Conservation... a way of life

111 North Hope Street, Los Angeles, California □ Mailing address: Box 111, Los Angeles 90051-0100
Telephone: (213) 367-4211 Cable address: DEWAPOLA FAX: (213) 367-3287

Recyclable and made from recycled waste ♻

BOE-C6-0110239

Mr. Hadar Plafkin

-2-

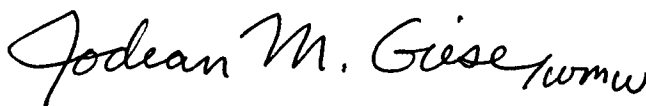
March 20, 1997

Currently the site is supplied by a 16-inch water line located on Normandie Avenue approximately 100 feet north of Knox Street. Figure 30 on page 271 of the DEIR shows the proposed water main to be installed within the site. This proposed water main will be connected to a 31-inch water main in Normandie Avenue and a 12-inch water main in West 190th Street. These two water mains are in two different pressure systems, so proper pressure regulation will be required to serve this area from these two locations.

The adequacy of LADWP's water mains to supply public fire protection can only be determined after the Fire Hydrant Unit of the City of Los Angeles Fire Department determines the future demand.

If you have any questions regarding the aforementioned comments or power service related issues, please contact me at (213) 367-0409.

Sincerely,

A handwritten signature in cursive script that reads "Jodean M. Giese" followed by a small monogram "JMGW".

JODEAN M. GIESE
Supervisor of
Environmental Assessment Business Team

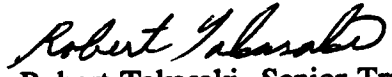
c: Jodean M. Giese

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

190th St. &
Normandie Ave.

Date: January 16, 1997

To: Darryl L. Fisher, Deputy Advisory Agency
Department of City Planning

From: 
Robert Takasaki, Senior Transportation Engineer
Department of Transportation

Subject: **TRAFFIC IMPACT ANALYSIS OF PROPOSED HARBOR GATEWAY
CENTER MASTER PLAN DEIR ALTERNATIVES**

The Los Angeles Department of Transportation (LADOT) has reviewed the traffic impact analysis of the proposed Harbor Gateway Center Master Plan DEIR alternatives prepared by Crain and Associates dated January 7, 1997. This analysis adequately describes the relative traffic impacts of the alternatives and is suitable for inclusion within the Alternatives Section of the DEIR.

However it should be noted that this analysis does not identify which mitigation measures are appropriate for each alternative. Before any of the alternative projects can be adopted, a supplemental analysis of that alternative project will be required. This supplemental analysis will need to be at the same level of detail as the project traffic study and would be used to develop appropriate conditions of approval. The supplemental analysis, however, is not necessary until such time as one of the alternative projects is being considered for adoption.

HS:harbalt

cc: Council District No. 15
Southern District, LADOT
Sue Chang, Department of City Planning
Sam Ross, Crain and Associates

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610

March 3, 1997

IGR/CEQA/DEIR#970216
Harbor Gateway Center
EIR 96-0090-SUB(ZV) (CUB) (DA)
McDonnell Douglas (applicant)
Vic: LA-213-7.98-9.98 & LA-405-13.99
SCH# 96051050



Mr. Hadar Plafkin
Planning Department
City of Los Angeles
221 N. Figueroa St., Room 1500
Los Angeles, CA 90012

Dear Mr. Plafkin:

RECEIVED
CITY OF LOS ANGELES

MAR 05 1997

ENVIRONMENTAL
UNIT

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project is a retail "power center" and office/industrial park on a 170-acre site. The first phase consists of 450,000 square feet of retail development. The second and third phases include an estimated 1.3 million and 1.2 million square feet respectively of office/industrial park space.

Based on our review of the DEIR for this project we have the following recommendation:

Mitigation measures for the San Diego Freeway off-ramp/project driveway and 190th Street are described in Item 20- Page 235 of the document. In addition to these measures, a wrong way deterrent is needed at the Route 405 Southbound off-ramp at project driveway and 190th Street.

We would like to remind you that this project's credits/debits need to be reported pursuant to MTA's CMP requirements.

A Caltrans Encroachment Permit is needed in all instances where the proposed work or transportation related mitigation measures falls within the State right-of-way. We recommend that the applicant submit an application along with six (6) sets of engineering plans to the Caltrans Permits Office for review.

Thank you for this opportunity to comment. If you have any questions, regarding these comments, please call me at (213) 897-4429.

Sincerely,

STEPHEN J. BUSWELL
IGR/CEQA Coordinator
Transportation Planning Office

cc: Chris Belsky
State Clearinghouse



Los Angeles City Planning Department

211 North Figueroa
16th Floor



March 10, 1997

TO: Hadar Plafkin
Project Coordinator
Environmental Review Section

FROM: Jack Sedwick, Principal City Planner
Community Planning Bureau

SUBJECT: REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
HARBOR GATEWAY CENTER (1414 W. 190TH STREET BETWEEN
WESTERN AND NORMANDIE AVENUES)
NO. 96-0090-SUB(ZV)(CUB)(DA); SCH. NO. 96051050, TT 52172

The following are our comments on the DEIR for the HARBOR GATEWAY CENTER in response to your request.

Project Description

The McDonnell Douglas Realty Company proposes to demolish approximately 2.4 million square feet of industrial/warehouse facilities and construct an approximately 3-million square-foot retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

Relationship to General Plan

The site is located within the Harbor Gateway Community Plan area, which was updated under the Community Plan Update (CPU) program, adopted by the City Council on January 26, 1996.

The Plan Land Use designation for the subject site is "Heavy Industrial" with corresponding zones of M3 and P. The proposed project includes uses which can be classified as both commercial and industrial, both of which are permitted under the plan designated land use category and zoning for the site. The prevailing land use pattern established in the vicinity is office and light industrial use, with limited commercial development.



The Community Plan Update, adopted by the City Council on January 26, 1996, revised the Community Plan Footnote No. 5 to read:

“Industrial areas not within specific plan study area boundaries or the area bounded by San Diego Freeway to the north, Del Amo Boulevard to the south, Western Avenue to the west, and the Harbor Freeway to the east, are intended to be limited to Height District 1VL.”

The project site, which is located within the above-mentioned area, is therefore exempt from the height restrictions of 1VL applicable to most other industrial areas in the community plan area.

The COMMUNITY BACKGROUND discussion in Chapter 1 of the Community Plan identifies the project proposed for this site.

The Plan’s COMMUNITY ISSUES AND OPPORTUNITIES section in Chapter 1 includes the *Issue* of “intrusion of commercial uses into industrially planned areas.” As *Opportunities* are listed “emergence of new commercial areas on industrially zoned sites” and “availability of large sites for reuse or development which are planned for job producing uses that improve the economic and physical conditions of the area.”

Chapter III - LAND USE POLICIES AND PROGRAMS of the updated Harbor Gateway Community Plan states in part that “the Harbor Gateway Center in the vicinity of the Harbor and San Diego Freeways junction has been designated as a center for commercial and industrial growth.” The Community Plan and General Plan Framework both recognize the potential for this area to become an important center.

The DEIR is accurate in its statements that development on the site may create compatibility conflicts with the adjacent residential uses to the south, that the project will result in significant traffic impacts on area roads and freeways, and that the two proposed 120-foot tall pole-mounted signs represent a substantial departure from City of Los Angeles sign regulations, which specify a maximum height of 42 feet. Staff recommends that site plan review or other discretionary review consider requiring mitigation measures to minimize compatibility impacts to the adjacent residences to the south, and signage more appropriate in size to the proposed scale of buildings on that portion of the site.

In addition, staff recommends that the analysis of environmental impacts of this project also consider the cumulative effect of its completion in conjunction with the anticipated development of the HARBOR GATEWAY RETAIL CENTER, an approximately 810,000 square-foot retail shopping complex proposed on the 67.43-acre Lockheed Martin Corporation site directly adjoining the subject property to the north and west.



DEPARTMENT OF BUILDING AND PLANNING

205 South Willowbrook Avenue
Compton, California 90220

Building: (310) 605-5509
Planning: (310) 605-5532
Fax: (310) 637-3484

JERRY N. GADT
Planning Director

CITY OF COMPTON

February 26, 1997

Mr. Hadar Plafkin, Project Coordinator
Department of City Planning
221 N. Figueroa Street, Room 1500
Los Angeles, California 90012

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
FOR HARBOR GATEWAY CENTER (SCH NO. 96051050, TT 52172)

Dear Mr. Plafkin:

The City's Traffic Engineer has reviewed the traffic study for the Harbor Gateway Project proposed for 1414 W. 190th Street, in the City of Los Angeles and offers the following comments:

1. Table 10 of the traffic study (page 43) shows an increase on west bound SR 91 traffic in the year 2006 of 252 vehicles east of Alameda Street during the AM peak hour over traffic without the project. This does not coincide with the LOS calculations in Table 11 (page 44) which show that future freeway traffic conditions will likely be similar with or without the project.
2. The City would like to see the developers of this project encourage Caltrans to add capacity to the 91 freeway in the future to handle both natural increases in traffic and those related to projects such as the Harbor Gateway development.

Thank you very much for giving us the opportunity to review the DEIR for the Harbor Gateway Project.

Sincerely,

BARBARA KILROY
SENIOR PLANNER



DONALD L. DEAR, Mayor
GWEN DUFFY, Mayor Pro Tem
JAMES W. CRAGIN, Councilmember
MAS FUKAI, Councilmember
PAUL Y. TSUKAHARA, Councilmember

CITY of GARDENA

1700 WEST 162nd STREET

GARDENA, CALIFORNIA 90247-3778

(310) 217-9500

MAY Y. DOI, City Clerk
LORENZO F. YBARRA, City Treasurer
KENNETH W. LANDAU, City Manager
LISA E. KRANITZ, City Attorney

March 18, 1997

RECEIVED
CITY OF LOS ANGELES

MAR 20 1997

ENVIRONMENTAL
UNIT

Department of City Planning
Attention: Hadar Plafkin
221 No Figueroa Street, Room 1500
Los Angeles, Ca 90012

Subject: Harbor Gateway Center Draft EIR - State Clearinghouse No. 96051050
1414 West 190th Street - between Western and Normandie Avenues

Dear Mr. Plafkin:

The City of Gardena appreciates the opportunity to comment on the draft EIR for the above referenced project. It is our opinion that when developed this project will have significant potential impacts on our city streets and residential neighborhoods south of Artesia Blvd. both project specific and cumulative which are not addressed in the Draft EIR.

Specifically, the related projects upon which the traffic analysis is based does not recognize a significant project within your own city boundaries, the Artesia Transit Center and Park and Ride. With a capacity of 1200 parking spaces and an exclusive busway and van and carpool entrance from 182nd Street, the transit center will greatly contribute to peak hour traffic on 182nd Street and Vermont Avenue, Vermont Avenue and Artesia Blvd. and Normandie Avenue and 182nd Street. When you consider the projected peak hour level of service for both Artesia Blvd. and 190th Street it would appear that use of alternative east/west streets such as 182nd Street which is signalized at both Vermont and Normandie Avenues would greatly increase. The EIR acknowledges impacts on the intersection of Vermont Avenue and Artesia Blvd. and proposes mitigation measures northbound at Vermont Avenue and Artesia Blvd. which leads us to conclude that there will be significant traffic movement northbound in the vicinity of 182nd Street. We therefore request that the conditions created by the transit center be factored in and that traffic calming measures be instituted to mitigate potential peak hour mobile source air pollution, traffic and noise impacts on 182nd Street between Normandie and Vermont Avenues.

Please feel free to contact me at (310) 217-9526 should you have any questions.

Very truly yours,

KATHY T. IKARI

Community Development Director

cc: City Manager, Kenneth W. Landau
Public Works Director, Ken Ayers

A:190th street

MAILING ADDRESS: P.O. BOX 47003, GARDENA, CALIFORNIA 90247-8803 FAX (310) 217-9894

BOE-C6-0110246



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY
Chief Engineer and General Manager

March 13, 1997

File No: 05-00.04-00

Mr. Hadar Plafkin
Project Coordinator
Department of City Planning
221 N. Figueroa Street, Room 1500
Los Angeles, CA 90012

Dear Mr. Plafkin:

Harbor Gateway Center

The County Sanitation Districts of the Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on February 11, 1997. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following corrections to the Draft EIR:

1. Sewer, Environmental Setting, page 277

The first paragraph of this section should read as follows:

Wastewater generated at the McDonnell Douglas property is treated by the Sanitation Districts of Los Angeles County (CSDLAC). The main sewer lines that serve the project site vicinity include the District No. 5 Interceptor Trunk Sewer, which ranges in diameter from 63 to 66 inches, and an adjacent 57-inch line, both located in a 15-foot wide easement in Normandie Avenue. Please refer to Figure 31 on page 278, for an illustration of existing (and proposed) local sewer lines. The CSDLAC plans to close either the District No. 5 Interceptor Trunk Sewer or the 57-inch line in 1998. New connections are allowed and existing connections can be used by new developments. Plans for existing connections have not yet been determined. In addition, CSDLAC is not permitting any new connections to a 90-inch line in Western Avenue.

After reviewing the third paragraph of this section regarding the Industrial Wastewater permits, several discrepancies were noted as follows:

To begin, the Industrial Wastewater Discharge Permits No. 799 and No. 800, which were issued to McDonnell Douglas Corporation at the 19503 S. Normandie Avenue situs address, are no longer active. Permits No. 799 and No. 800 were voided on May 15, 1996 and August 21, 1996, respectively. Hence, the discharge at the site is currently not regulated under any industrial waste permit. In addition, Permit No. 800 was reapproved in 1981, not 1991.

Although the baseline sewer capacity units established at the site is 1896.44, the Districts does not recognize or establish a baseline flow. The baseline capacity units was established from the 1976-77 Surcharge Statement which reported a discharge flowrate of 618,840 gpd. The 660,285 gpd flowrate is the total combined permit flowrates issued to Permits No. 799 (110,285 gpd) and No. 800 (550,000 gpd) and includes only industrial wastewater, not sanitary. The 660,285 gpd flow does not translate to 241.0 million gallons annually (based on 365 discharge days per year) since McDonnell Douglas Corporation was only discharging five days per week. Last, the Districts does not have any information available to verify if the company is currently discharging 6.6 million gallons per year. Both permits were voided after inspections verified industrial wastewater was no longer being discharged at the site. For additional information regarding the above Industrial Wastewater Discharge permits, please contact Ms. Alicia Jaurequi in our Industrial Waste Department.

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry



Marie L. Pagenkopp
Engineering Technician
Planning & Property Management Section

MLP:eg



Los Angeles County
Metropolitan
Transportation
Authority

One Gateway Plaza
Los Angeles, CA
90012

213.922.6000

Mailing Address:
P.O. Box 194
Los Angeles, CA 90053

March 12, 1997

Hadar Plafkin, Project Coordinator
Department of City Planning
221 N. Figueroa Street, Room 1500
Los Angeles, CA 90012

Subject: Harbor Gateway Center

RECEIVED
CITY OF LOS ANGELES

MAR 13 1997

ENVIRONMENTAL
UNIT

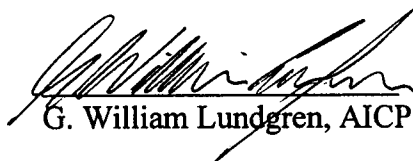
Dear Mr. Plafkin:

The Los Angeles County Metropolitan Transportation Authority (MTA) appreciates the opportunity to provide comment on the Draft EIR prepared for the above project. However, an insufficient amount of time has been provided. Though the Notice of Completion and the Draft EIR both bear the same issuance date of February 6, 1997, we did not receive the notice or the document until March 3, 1997. We therefore request your accommodation of an additional two weeks to allow for circulation and review by our staff. Comments from MTA staff are due back to me by March 28, 1997. Our letter of comments will be received by you on or before April 4, 1997.

Thank you for your consideration of our request. For purposes of CEQA document review, please make certain you are using the following address:

G. William Lundgren, AICP
Congestion Management Program
MTA
One Gateway Plaza, Mail Stop 99-23-2
Los Angeles, CA 90012-2932

Sincerely



G. William Lundgren, AICP